

Transcript - March 25 AmeriCorps Rulemaking Session

AMERICORPS RULEMAKING SESSION

MARCH 25, 2004

CONFERENCE CALL

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COORDINATOR Good afternoon. Thank you for standing by. At this time, all participants are in a listen-only mode. Today's conference is being recorded. If you have any objections, please disconnect at this time. Now I will turn the call over to your host for today's conference, Ms. Rosie Mauk. Ms. Mauk, you may begin.

R. MAUK Yes, actually, good afternoon, everybody, or good morning wherever you are. Actually, we're going to start with David Eisner, our CEO.

D. EISNER Hello, everybody. Before we get going, I just wanted to let folks know, the operation just asked you to press *0 if you would like to make a statement. The reason is that we know how many people are signed up on the phone, but we don't know how many of you would like to listen and how many of you would like to make a statement. We have not, at this time, set maximum times for folks to speak, but if, knowing that we have about two hours, you would like to make a statement at some point during this call, please press *0.

COORDINATOR Sir, it's *1. I made the mistake, sorry.

D. EISNER Thank you. Please press *1 now so that we can have a count of all those that would like to make a statement during this discussion. I'll wait for just a moment, and then we'll get started with an introduction.

COORDINATOR Sir?

D. EISNER Yes.

COORDINATOR Five people would like to make a statement.

D. EISNER Terrific. We're not going to need to put time limits on the speaking. If, during the call, after those five people make their statements, anyone else would like to speak, I believe we'll have time for that.

I want to thank everybody for joining this call and thank you, in general, for taking part in the discussion about AmeriCorp rulemaking. We know, as well as all of you out there, what a busy time of year this is, and we know that we've got deadlines opening and closing all around us.

Basically, what we want to do in this call is listen to folks that have points of view about the issues that want to discuss in rulemaking. With me in the room here, as you've heard already, we have Rosie Mauk, the Director of AmeriCorp; Frank Trinity, our General Counsel; and Gretchen Van der Veer, our Director of Training and Technical Assistance.

Before we open this up to hear, though, from you, let me spend just a moment to set the scene and then turn it over to Rosie Mauk to walk through some of the specific issues that we're looking, particularly, to get your insights on.

It's no surprise that AmeriCorp has emerged from an extremely challenging couple of years. '02 and '03 were extremely difficult for the corporation; more importantly, they were extremely difficult and remain extremely difficult for the field.

For all of our excitement and happiness that we received additional funding, we understand that the field is going to continue to be in some amount of dislocation through the fall when that funding will begin to get out into the field.

At the same time, though, we're really seeing a tremendous turnaround. I talk about the best of times and the worst of times. We are currently looking forward to a year where we're going to be able to get out 75,000 AmeriCorp members, where we are going to benefit from the largest funding increase in the history of the AmeriCorp program, where we are seeing broad bipartisan support in both the House and the Senate, where we are seeing virtually every governor publicly expressing their strong support for the program.

We're seeing hundreds of newspaper editorial pages supporting the program at the national, regional, and local level, and we're seeing public awareness that is stronger and more positive for AmeriCorp than at any time in its history.

There are a couple of reasons for that; one is, as the saying goes, you don't know what you've got until it's gone. Because we've had a tough couple of years, particularly last summer, the level of threat to the program became so clear that people that had been taking it for granted for years were forced into recognizing what they might have to do if they no longer had this program, and it galvanized a level of awareness and support that really exceeded our imagination.

Secondly, and relatedly, our grantees were the ones that did the work. Our grantees are the ones that built this level of public awareness, this level of public support. They did the outreach to all their constituencies to alert them to the problem, educate them to the issues.

So now we have an incredible moment of opportunity, where we can take this momentum and move forward, but we're facing a couple of stuck points.

The toughest set of stuck points are that every year that we issue a set of guidelines, where we're forced to wrestle with issues that a lot of policy-makers and others have very different points of view about, issues related to sustainability, matching requirements, federal share, among others. That creates a level of instability and lack of predictability for our grantees. So our grantees don't know from year to year how to think in terms of their matching requirements.

They don't know year to year what the cost per FTE is. They don't know year to year where we're going to be putting our emphasis, and most importantly, they don't know year to year what our funding level is going to be because these exact same issues are being fought in Congress. The stakes each year are that funding can potentially get held up on any one of these issues.

That doesn't only create problems for the budget planners for our grantees; it means that our grantees have a hard time soliciting funds because foundations are constantly confused about the level of support that the corporation has. It makes it more difficult for our grantees to work with state and local government, and it makes it more difficult for our grantees to work with regional and national partners, all of whom have a hard time understanding what the future of the program is going to be.

Our board of directors has directed us to resolve these issues for rulemaking, and moreover, Congress, in its '04 budget appropriation directed us as well to deal with these issues in rulemaking this year. Most recently, the President, President Bush asked the corporation to manage these issues through rulemaking. So that's what we're going to do.

Normally, rulemaking requires that the agency draft a set of guidelines, seek public comment, and then, taking that comment into consideration, issue final rules. We're adding a step to that by seeking comment prior to drafting regulations. We're doing that because we believe that we could only get it right, first of all, if we understand the specific needs and concerns and points of view of the people who will be most affected by these rules, and secondly, because we believe that some of the best ideas in innovation are happening out in the field by our grantees, by our state commissions, and by others, and that it's very likely that the right set of solutions for us to address these issues will, at least partly, emerge from having this engaged dialog with the field.

So that's what we're doing here, and we've already had two rulemaking sessions in person: one in Columbus, one in Seattle. I'm going to be, unfortunately, leaving this call a little bit early so that I'll be able to fly to Boston for a rulemaking session tomorrow, although this call is being recorded and will be transcribed. Then there will be another one in Dallas/Fort Worth, and finally, one in Washington DC. In addition, I believe we're going to be holding two more conference calls.

So again, before I turn it over to Rosie to walk quickly through what the issues are, let me finally add two very important points. First of all, we have not in any way predetermined what the outcome to this rulemaking is going to be. We know that we are going to issue rules. We know that we are going to fulfill the mandate required by Congress and the President and our board to seek greater efficiency, greater accountability, and to lower federal costs for the program. At the same time, nothing is predetermined. We want to hear every viewpoint and we want to make sure that we do it in the best way possible.

Finally, I wanted to set a second rule, which is that we are determined that we will have a fair and equitable outcome, as well as a fair and open process. We are doing everything that we can to achieve that on the process side, and you will quickly be able to see, when we do our draft rules, whether we're able to achieve that on the outcome side. So with that, I'll turn it over to Rosie to walk quickly through the issues we're dealing with, and then we'll open it up to your comments.

R. MAUK Great. Thanks, David. I hope all of you – certainly if you’ve taken the time to be on the call, you’ve probably taken the time to go to our Web site and download the materials that we have. We’re going to continue to keep updating that Web site, by the way, as we’ve got new items to add to it, so keep watching it. But you’ll notice on there that we have seven issues there were listed in the federal register. They’re not the only issues, but they’re some of the primary issues that we’ve been hearing from you and hearing from Congress.

I’m going to quickly walk you through. The first one is a more general question. As AmeriCorp continues to grow, what changes can you identify to make the program more efficient and effective? Indeed, our board of directors recommended to us, over a year ago, to either eliminate or greatly streamline our annual guidance, as David described, by converting them into provisions and regulations.

The next one that seems to be of biggest interest is sustainability. A couple of questions that we’d like you to consider is how can the corporation in the field achieve the right balance of federal and private support? To what extent should the level of corporation support for a program or project decrease over time? How can the corporation further support and encourage greater engagement of Americans in volunteering?

Our board and our appropriators in Congress have asked us to define sustainability. Congress has said to us that they would like us to establish policies and procedures to set limits on the number of years that recipients may receive assistance to carry out a project, increase match requirements, and implement measures to determine whether projects are generating sufficient community support.

Then, under the issue of federal share, should the corporation calibrate matching requirements to reflect the differences among programs? Should the program adopt matching requirements for member-related costs that are different from requirements for other program operation costs?

The White House, in their executive order, said to us, “National and community service programs should leverage federal resources to maximize support from the private sector and from state and local governments, with an emphasis on reforms that enhance programmatic flexibility, reduce administrative burdens, and calibrate federal assistance to the respective needs of recipient organizations.” Our appropriator said to us that, “To the maximum extent practicable, the corporation shall increase significantly the level of matching funds and in-kind contributions provided by the private sector and shall reduce the total federal cost per participant in all programs.”

In regards to performance measures and evaluation, what are appropriate performance measures for programs, and how should grantees evaluate programs? Again, the White House said to us, “National and community service programs should adopt performance measures to identify those practices that merit replication and further investment, as well as to ensure accountability.”

In regards to literacy and reading tutors, the question, “How can we ensure that members serving as reading tutors have the skill and ability to provide the necessary instruction to the populations they serve? How should the curriculum and training requirements – what should the curriculum and training requirements be for literacy programs?” In the executive order, the White House said, “National and community service programs based in schools should employ tutors who meet required peer

professional qualifications and use such practices and methodologies as are required for supplemental educational services."

Two more: our timing of our grants. Does the current time frame for awarding grants work and what improvements can we make? Our board of directors asks that the corporation consider shifting the grants calendar back, and the appropriations committee said to us, "The conferees encourage the corporation to consider a change to the grant cycle so that grant awards can be made to recipient organizations before the organization recruits members to fill awarded slots."

Lastly is our selection criteria. What criteria should the corporation use in selecting programs? How can the corporation streamline its grant application process for continuation applications? Our appropriators have said to us that, "To ensure that priority is given to programs that demonstrate quality, innovation, and sustainability." So with those as kind of a backdrop, we truly are about through talking here, and I'm going to turn it over to Gretchen Van der Veer, who is just going to tell you the process of how we're going to listen to you today.

G. VAN DER VEER Hi, everyone. I'm looking at the list of individuals who RSVPed to be on this call today, and I see many familiar names. So I just would like to say that we do want to hear from you. While only five of you acknowledged at the beginning of the call that you have a prepared statement to make, we do want to encourage folks to step forward and speak to one of the seven issues that Rosie just outlined, or to any other thing you'd like to say that could help us improve the AmeriCorp program.

When you speak, you will indicate your interest in doing that and get in the queue by pressing *1. Then, when the operator acknowledges you, I would like you to please start by stating your name and your affiliation. Remember, David said this call is being recorded, so it's really important we know which statement goes with which participant. So after you state your name and affiliation, please go ahead and speak to whatever issue it is that you would like to speak to, or to all of them.

We're not going to limit your time; however, if I do know that there are a lot of other people in the queue, and if the operator can continue to give me that information, I may insert myself and say that we would like to move along to some other callers so could you please summarize your comment.

At the end of your comment, I will then turn to David and Rosie and ask them if they have any clarified questions for you. Again, we want to make sure we really understand your perspective in order to write the rules in a way in which is the most thoughtful and gets the most from these conversations we've had with the field, so there may be some questions for you after you're finished.

Then we will move on to the next caller. Then, at the end, we will leave some time to wrap up and talk about, for those of you who would like to continue to inform this process, how you can continue to do so. So with that, operator, we're ready to take the first person who would like to make a statement.

COORDINATOR David Battey, you may ask your question.

D. BATTEY Yes, this is David Battey, President of Youth Volunteer Core of America in Kansas City.

G. VAN DER VEER Hi, David. Go ahead.

D. BATTEY Just as a brief background, YVC recruits middle school and high school-aged volunteers in 46 different communities, both large and small, across the country. Those middle school and high school volunteers have benefited tremendously from having AmeriCorp supervision, and many of them have been recruited by AmeriCorp members in the past.

We, unfortunately, did not get any AmeriCorp members for the first time this past year. Obviously, we were disappointed about that, but if there was any silver lining in that disappointment, it was the fact that it caused us to emphasize sustainability even more. For that reason, my comments, particularly today, have to do with volunteer generation and volunteer leveraging.

I think it's very important for the corporation for national and community service to continue to emphasize that and even provide, perhaps, some sort of benefits to organizations that apply for AmeriCorp members who are going to generate volunteers with those AmeriCorp members. We do it, really, in two ways.

One way, I'm being very self-serving because our whole mission is, obviously, generating volunteers who are middle school and high school age. We begin the process of serving 4,000 hours, as our President has urged us to do, during the course of our lifetime. Some of those young people begin generating hours even before middle school, but certainly, middle school and high school has been showing to be a very effective time for young people to develop an ethic of service and develop, hopefully, good habits, as opposed to some bad habits that can develop in, especially, the middle school years.

But perhaps more important, and a little bit less self-serving, is the importance of volunteer generation, what it has meant for our sustainability, especially over this past very difficult year in the sense that we have utilized AmeriCorp members to generate adult volunteers who serve as quasi AmeriCorp members even though they are not being paid and even though they are not a part of the AmeriCorp program in any way, shape, or form.

For example, we have adult volunteers that may come from junior league, adult volunteers that may be the parents of those middle school and high school youths who are serving. We also consider adult volunteers those college students or interns that volunteer to help YVC in some way, shape, or form.

So, in effect, what has happened during this difficult year of not having an AmeriCorp grant is a lot of the work that was done by AmeriCorp members over the past few years, when we did have AmeriCorp members serving in a number of our local affiliates, was the AmeriCorp members generated enough continuation of adult volunteers where the adult volunteers were able to sustain YVC activities even though at a lesser level.

Even though this year we will not serve as many middle school and high school, we will not give, in effect, middle school and high school volunteers, as many of them, the

opportunity to serve is what would have happened had we been successful in receiving an AmeriCorp grant this year, not one of our local YVC affiliates had to go out of business, in effect, because we did not get an AmeriCorp grant.

I also think, and this is going to be my last point about the volunteer generation, a leveraging point, is I think Rosie mentioned a couple times, and David has as well, the importance of increasing the efficiency and the effectiveness of AmeriCorp grants. I can't think of a much better way of increasing the efficiency and effectiveness of your grants than to have local programs like a YVC chapter in a smaller town or a larger community be not only encouraged, but in some ways even forced to generate adult volunteers and sustainable volunteers.

As I say, it's going to be part of our mission forever to recruit middle school and high school volunteers, but by forcing our AmeriCorp members to recruit those adult volunteers in some way, shape, or form, it really helps the efficiency and the effectiveness of an AmeriCorp grant.

I think it also helps to solve some of the problems that you face at the Corporation for National and Community Service about sustainability because those exact same issues are the ones that face me as a president of a national-wide EC office. How are we going to make 46 different affiliates around the country sustainable and not overly dependant on any one source of funding or any one source of staffing in the form of AmeriCorp members, or interns, or RSVP senior volunteers? Certainly we don't want any of our local sites to be dependant on any one source of actual cash funding, whether it be Learn and Serve funding or a private local funder.

So those are my brief comments about urging you to keep the volunteer generation/leveraging as part of what the corporation either encourages or even requires of your AmeriCorp grantees.

G. VAN DER VEER Thanks very much, David. Rosie or David, do you have anything to ask, any clarifying questions here?

D. EISNER Two questions, if you could answer them relatively quickly, if you don't mind. First, you mentioned that without the AmeriCorp members you're able to keep all your programs open, but to a lesser extent. Are you able to characterize what you mean by a lesser extent? Are you running at about half speed, quarter speed, three-quarters speed?

D. BATTEY Well, David, it really depends on the site. Some of our local programs have had up to seven or eight full-time AmeriCorp members serving in their community. Some of our smaller youth volunteer corps chapters have had as few as even a half-time or even one full-time AmeriCorp member serving in their community. So it varies, but if I had to make a guess, I would say that our average program, as far as number of youth volunteers who served last year and how many will serve this year, those that were affected by not receiving AmeriCorp, we'll probably see a reduction somewhere around 35% in terms of number of youth volunteers who will be able to do service this year, as opposed to the numbers that would have done service had we had an AmeriCorp grant.

D. EISNER That's terrific. Then I guess my second question is, if I'm hearing you right, and I think you actually used this line, sort of the silver lining of a black cloud,

does this make you feel like, over the long term, you would intend not to use AmeriCorp members and, instead, replace them with volunteers, or are you simply saying that you feel like you just need to be prepared for specific streams that you're working with to go away?

D. BATTEY Well, David, one of the things we look for in placing AmeriCorp members in any one of our sites is a local YVC program utilizing AmeriCorp members efficiently. In other words, if they've had the same number of AmeriCorp members for a number of years, has that, in effect, has their program leveled off at a certain number of youth volunteers for five AmeriCorp members, let's say, or has the program grown exponentially as the five AmeriCorp members have served in years one, two, three, or four? If that number of youth volunteers has stayed the same and the AmeriCorp allotment has stayed the same, we have a concern with that.

We want a local program – let's say, the AmeriCorp members stay the same. We feel like those AmeriCorp members should be generating enough additional help in the form of adult volunteers, enough efficiencies of scale so that ultimately those five AmeriCorp members in that one site may have only served 250 youth volunteers in the first year, but after a number of years, those five AmeriCorp members are now leveraging, maybe, a couple of thousand of youth volunteers in their community.

D. EISNER Thank you very much.

G. VAN DER VEER Thank you, David, for sharing your experience with Youth Volunteer Corps. Can we have the next caller, please?

COORDINATOR Tina Cheplick, you may ask your question. Ms. Cheplick, please check your mute button.

T. CHEPLICK This is Tina Cheplick. I am the Deputy Director of the Grantmaker Forum on Community and National Service.

R. MAUK Hi, Tina.

T. CHEPLICK Hi, Rosie. A few points and an offer to be of assistance: The Grantmaker Forum on Community and National Service is a network of grantmakers who, over the past decade, have invested in National Service and other forms of service and volunteering. We've been actively engaged in working with AmeriCorp and National Service from the beginning of the creation of the corporation.

We understand the pressures on the corporation from Congress to reduce the federal share of cost. On behalf of the grantmakers who are in our organization, I am here to say that we would like to help the corporation answer those questions from Congress and also help make it clear that private philanthropy can only supplement the federal allocations and can never replace the federal role in this movement of national significance.

Those funders who have been long-time supporters of National Service like it not because it's a local program, but because it is a national infrastructure with potential to change the way our young people see their role in citizenship. That is an appropriate role for the federal dollars, and private philanthropy can supplement it in many ways.

We have some material written about that, and we stand ready to assist the corporation to use that, as appropriate, in the work with Congress.

My second point is that funders in our organization are not supportive of the idea of term limits for successful effective AmeriCorp programs. As I said in my first point, we see National Service as a national infrastructure for a movement of great significance and value, and long-time successful programs, well established, have the capacity, as David noted in his remarks, to really be more cost effective over time. In fact, we think it would be a terrible waste of federal dollars to constantly replace small programs with more small programs, much better to build the infrastructure using the success and efficiency that you've created with successful programs in the past.

However, we do have concerns that there is a need for innovative program seeding for some smaller organizations and groups to get engaged, and perhaps this is an appropriate place for private philanthropy to supplement the federal dollars. We'd be ready to have a conversation with whoever would like to talk more about that.

We're also concerned about rural communities because many rural communities are without the kind of private philanthropy that urban communities have to make the match that's currently required. We think that the corporation can, in talking with some of the national funders, perhaps, find a way to address that gap.

My third point is that funders, who have been slightly interested in National Service, but not investing in it, are often asking questions about impact results, looking for research. We believe that the corporation has amassed a huge amount of data that could be better analyzed and mined to give us some answers; answers that might attract new funders, answer questions of potential funders, and engage and augment the private philanthropy that you currently have supporting AmeriCorp.

We believe that the capacity of the corporation, right now, to mine this information may not be what you need, and perhaps there is some way that private philanthropy can assist with that, in picking up the inventory of AmeriCorp members out there, and what they've done and continue to do once they leave AmeriCorp. If there is some way that private philanthropy can assist in getting those answers, not only would it be a short-term benefit, but the long-term benefit of, perhaps, engaging additional funders.

Again, my final point about funders: Very often foundation representatives hesitate to participate in policy discussions because of limitations set by their foundations, by their legal counsel for their tax status. We, at the Grantmaker Forum, are prepared to participate in these policy decisions, policy discussions.

If you, in talking with your grantees or anybody else on this call, know of funders who have opinions about these rule changes, if they have experience that they would like to present, but are hesitant because of limitations within their foundation guidelines, we, as a non-profit organization, would love to receive that information and compile it in a way that would be helpful to the corporation.

G. VAN DER VEER Thank you, Tina. David, Rosie?

D. EISNER Well, first of all, we accept.

R. MAUK Yes, on all three, four, five.

D. EISNER Thank you. We'll figure out a way to have the conversation. Let me, though, push a little bit on one of the underlying points. It's difficult, sometimes, for us to get to hear comments on this from funders.

We feel like often what we'd like to hear from funders is if you were a grantmaker in our position, which is the position that the corporation is in, having extremely limited resources, moving into an area where demand is greatly surpassing supply, saying yes less and less frequently and no more and more frequently, how should we be thinking in terms of our responsibility around appropriate distribution of our grant making?

Yet, what we hear from grantmakers, rather than how we should be thinking responsibility about ourselves as grantmakers, is more the defensive position. Hey, we can't pick up the slack. Don't pass any of it to us.

But don't you agree, Tina, that basically most responsible grantmakers, whenever they make the grant, consider what the optimal and sub-optimal outcomes of that grant should be and whether they would or would not consider renewal, and for what period of time?

T. CHEPLICK Well, of course, grantmakers consider outcomes, but there are also the situations of a funder looking at a community and assessing what are the cornerstone establishments or the elemental parts of their philanthropy that they wish to ensure are there year after year after year.

Yes, it's great when organizations have their own endowments and can keep that going, but very often a funder does need to make that determination and know that for one particular cornerstone kind of organization, like a childcare program or a healthcare program, there may be programmatic shifts over time that they influence through their grant making, but the question of keeping an infrastructure in place so that, let's say, in this case of the corporation's interests, the generation of volunteers.

In order to keep that system going, that there does need to be something that is there in place year after year that the community can depend on. The question of how to keep that in place, when to use grant monies, what can endowments do, what can private philanthropy do? That's a situation that funders look at all the time.

There is a movement afoot within philanthropy questioning some practices of the past couple decades of always following innovative programs and trying to prompt innovation, often at the expense of infrastructure or certainly at the expense of cost effectiveness within organizations. So I think that's the question for our AmeriCorp system and infrastructure; what are the elements that do need to be in place that we want to have, really, as part of the armature on which we can hang annual expectations, innovation, as well as a vision of the future ten, 20 years out?

D. EISNER Thank you very much.

G. VAN DER VEER Tina, thank you for that response and for your elaboration on your point. We're going to go to the next caller, please.

COORDINATOR Martin O'Brien, you may ask your question.

M. O'BRIEN Hi, this is Marty O'Brien. I'm Vice President of the National Association of Service & Conservation Corps here in Washington. I have a couple of very brief comments: one on an issue identified by the corporation and just a couple of comments on other issues.

The issue that I would like to address first is the timing of grants. NASC would like to urge that the grant review process be handled in a manner that ensures that the awards will be made according to the previously announced schedule. Grantees cannot maintain program infrastructure while waiting weeks or months after the anticipated announcement date to learn whether or not the program will be funded.

We'd also urge that the corporation be particularly sensitive to the timing of grants that are seasonal or those that are dependant on school years.

The other two issues are diversity. NASC would also urge that any changes in the program should not make AmeriCorp less diverse. In fact, we hope the corporation will do more to promote diversity so that AmeriCorp, indeed, looks like America. We hope that the rules will reflect the fact that programs whose enrollment focuses on low income, out of school, and minority young people are likely to have greater difficulty recruiting and retaining members than programs that recruit more affluent members.

Lastly - and this is something you've heard from NASC before - we really urge the corporation to retain the environment as a priority. We believe that this reflects one of our nation's critical needs, and we hope that it will be retained.

G. VAN DER VEER Thank you, Marty. Any questions from Rosie and from David?

R. MAUK Well, Marty, just so you know, we're very aware of some of the situations we've had in the past with the grant making, and that's why it's an issue for us to look at. I appreciate you continuing to bring it to our attention.

M. O'BRIEN Great.

G. VAN DER VEER Okay. Operator, can I ask, how many people have queued up since the last time we asked for a caller?

COORDINATOR You have only one more person.

G. VAN DER VEER Okay. Let's take that person.

COORDINATOR Rob Glazier, you may ask your question.

R. GLAZIER Good afternoon. It's good to be with you; I appreciate having this chance to speak with you. My name is Rob Glazier with Michigan Department of Agriculture, and I'm the AmeriCorp program director for Michigan Groundwater Stewardship Program.

G. VAN DER VEER Hi, Rob.

R. GLAZIER We are a statewide program with members providing groundwater education all around the state for groundwater protection. Right now, we're in our seventh year of funding through our State Service Commission, and then prior to that we received funding direct through the U.S. Department of Agriculture for three years. I've served for two years, as an AmeriCorp member with the program, and then I've spent the last six as program director.

We are opposed to the corporation limiting the number of years a project may receive funding, and hopefully my testimony will show how the corporation, the State of Michigan, our local communities, and our members benefit from our program's years of experience.

Each year of funding we have shown an increasing impact in the communities where we serve. Our member service takes place in three types of interactions with the public.

The first one is one-on-one service with landowners to develop an environmental risk assessment on their property to address groundwater risks and develop a plan to address them and lower them. The second type of interaction is through group presentations with community groups focusing on the same type of risks. Then the third and least intensive of those interactions is at fairs and festivals, and other community events, where we have display and informational booths.

In year one of our funding, we had interactions with approximately 4,000 adults, and if you divide that by the number of members we had that year, that works out to be roughly 333 people reached per member. By year five, that number was up to 16,000 adults reached, and that worked out to be about 800 reached per member. If you look at our results from last year, the number was up to 40,000 adults reached by our members and the community volunteers that they trained, and that works out to be about 2,000 people per member.

If you add to that the over 22,000 students our AmeriCorp members reached last year with water quality education, you can see that we've increased our program efficiency and are reaching more and more people each year.

As our training of members and our program delivery system has improved, we've also improved our evaluation work. What we know from our survey work, which was conducted by Michigan State University's Center for Evaluative Studies, is that in years one through five, we focused on taking a look at increasing awareness, increasing knowledge concerning groundwater and water quality issues. We found that, on average, about 85% of those people we reached and responded to the surveys improved, in some manner, their awareness and knowledge level of groundwater issues. That was good information to have, but that wasn't enough for us.

We needed to show further that those people that we reached were somehow motivated or inspired by our AmeriCorp members to make changes in practice to help protect groundwater. So, over the last two years, we have changed our evaluation work to focus on those results to see what exactly our members are doing in the field that are leading to changes by the citizens they reach.

We now know the following percentages of people have made or are in the process of making changes in the following practices: 31% now identify a specific pest before using a pesticide; 55% now test their soil for nutrient levels before applying a fertilizer; 36%

now know how to and do measure their lawn size to ensure accurate fertilizer application; 36% no longer store pesticides in their garage or in their home; and 33% know how to and have disposed of these chemicals properly.

So again, I'm getting into kind of specific numbers here, but the point I want to make is to show that increasing efficiency, say, from year one to year five, and year five to year seven, in terms of the number of people that we've reached, and then, further, the actual interactions that we have with those people, are resulting in not only increasing awareness and education levels, but more and more change is happening in the field.

The other impact that this efficiency has had is that in year one we covered 19 counties in Michigan, and by year seven that number was up to nearly 50 counties.

The other thing I want to stress is that we're certainly not opposed to developing sustainability plans. The community volunteers who have helped us meet our objectives and the increasing partnerships that we formed over the years are part of what our plan includes. In addition to that, Michigan also has a match requirement policy that increases the amount of match a program needs to provide starting in year five of their funding.

So this year, for example, our program has to cover, with match, all of our program support costs, while our AmeriCorp grant covers a percentage of our member living allowance and member support. Without this AmeriCorp grant our service wouldn't be possible. Some of the activities carried out by our community volunteers would certainly continue, but the organizational collaborations would not. It's these partnerships, which allow us to meet our objectives across the state.

Our members bring together the appropriate local agencies, non-profit groups, faith-based organizations, and other community groups to allow for this effective service. So the corporation should not limit the number of years a project can receive funding, but it should expect increasing performance each year a project is funded. So each year we need to show more and more people reached, leading to more changes happening in the community, and we need to show more partnerships built to allow this service.

We need to submit a sustainability plan to our state commission that people who know our programs inside and out so that we can show how our service is having long-term impacts in our communities where we serve. In the case of groundwater protection, that means not only do we show what's going to happen three years down the road, but we need to show the natural resource impact 20 years down the road from groundwater education and lowering the risks of contamination. If we can't show these advances year to year, then, simply, we should not be funded.

We're also not anti-new programs. What we are in favor of is measuring programs and projects by demonstrated need and the demonstrated ability to meet those needs or similar needs. In our case, protecting community and individual drinking water supplies is our need, and we feel that over time we've demonstrated an increasing ability to do this. So the corporation should be looking to have the most service and the most public good come from the money that they do spend.

G. VAN DER VEER

Okay, Rob. Thank you so much. I think we have a question

from David.

R. GLAZIER Yes?

D. EISNER That's a very, very powerful set of statements you made. Thank you.

R. GLAZIER You bet.

D. EISNER I just want to check to make sure I heard a couple of things right.

R. GLAZIER Sure.

D. EISNER First of all, you referenced how Michigan increases its match requirement following year five. It felt like you were saying that's something that we should – that you think that that's an okay practice and something that we might consider.

R. GLAZIER I do think that that is an okay practice. I know that Michigan has put in place a system where that's their general guideline, and they're willing to take a look at case-by-case examples. In the event that a program needs to move along, if that's increasing match at a slower rate, I believe that they're willing to consider that. I certainly think that we need to show that the money that we're spending goes farther and farther, and I think that's the responsibility of an existing program to show that. So the idea of increasing match, I'm certainly okay with.

D. EISNER Second question: Would you agree with the hypothesis that we might actually make a choice? If we followed your suggestion to require increasing productivity or, as you put it, efficiency for the same resources year over year, would you say that it stands to reason that if you have the same productivity year over year that that should – you seem to say that that should result in no funding, and I'm testing whether you might think it would be more appropriate to say that for the same productivity then funding would decrease. So basically we sort of force increased efficiency either through the same funding with more productivity or through the same productivity with less funding.

R. GLAZIER Yes, I do agree with that. I feel that, for example, us, as a program, if we can't show increased efficiency with the same funding, if we can't show new partnerships, then we shouldn't stay at level funding and we certainly shouldn't get a funding increase. I think it's ...

D. EISNER My final question is are you worried about hitting the wall? At some point, are you going to be at maximum efficiency and, once you get to maximum efficiency, should that be the point that the agency then says you could be the most efficient program in the country after 20 years, but once you stop getting more efficient, because you are at peak performance, should that be the point at which we say, "Okay, you're not growing more efficient now year over year. Let's cut it off."

R. GLAZIER That's a tough question to answer. It's hard to imagine, at least in terms of our program, it's hard to imagine getting to that point. If we're taking a look at protecting the drinking water in Michigan that, ultimately, to do so we'd have to reach all the citizens in Michigan, it's hard to imagine getting quite to that point.

I do know that to reach new audiences, to reach those that we haven't reached before, requires innovation and requires new efficiencies and creative thinking. If we don't have that innovation and creative thinking, then, at that point, if you want to call that a wall, I think that's okay, but if we can't find that new innovation to reach the people we haven't reached before, then it's time, perhaps, for someone else to step in and do that.

D. EISNER I was planning on letting you escape, but I had one more question.

G. VAN DER VEER Well, Rosie has one after you, David.

D. EISNER Can I generalize your point of view to basically say that as a program becomes more mature or receives funding for a longer period of time, it is fair to raise the bar, the competitive bar, that it's fair to say that a program has been getting funding for ten years should have to prove more in a competition than a program that has been getting funding for two years or a new program?

R. GLAZIER The point in my remarks is that programs should be measured on demonstrative need and ability to meet that need. It's my opinion that an existing program likely has a leg up in being able to demonstrate that they can meet that need. It's difficult for me to generalize.

I'm certainly fine with having the standard that you described for our program. I fully expect that the bar could be raised each year for us. I don't think our state commission would let us get away with proposing to do the same thing each year. They raise the bar for us, and we welcome that challenge.

I do know that some programs change their focus program year to program year more than we do, so it might be difficult for me to say the same for them, but in our case, with largely similar activities and similar types of objectives year to year, I would fully expect the bar to keep getting raised.

D. EISNER Thank you very much.

R. MAUK I have one quick question, Rob.

R. GLAZIER Yes.

R. MAUK You said, in the very beginning, that you received funding from the Department of Agriculture for three years before you started receiving our funding. Do they have limits on how long you could keep applying for that money?

R. GLAZIER Our original funding through the U.S. Department of Agriculture?

R. MAUK Yes.

R. GLAZIER That was before my time, and I'm not sure how well I can speak to that. My understanding is that a number of AmeriCorp programs were originally funded through federal agencies and that the corporation decided that they would no longer fund those programs through the federal agencies.

R. MAUK You're right. I remember that. We funded some EPA programs, etc. Thank you for reminding me. Thanks, Rob.

R. GLAZIER You bet.

G. VAN DER VEER Okay. Are there any other callers that would like to make a statement?

COORDINATOR Yes. Stacy Mullins, you may ask your question.

S. MULLINS Hi.

G. VAN DER VEER Hi, Stacy.

S. MULLINS This is Stacy Mullins. Hi. I'm calling from the Getting Things Done for Kentucky's Homeless AmeriCorp program in Kentucky. I'm the AmeriCorp program director here. You'll have to bear with me for a second because I didn't have a prepared statement; I just kind of wanted to mention something here at the end.

I wanted to speak to the question of increasing the match requirements. While we are certainly trying to reach out to the private sector for money for our program, it has been quite difficult for us here in Kentucky. We've had to look to our host sites. Let me just give you a background on our program.

We're a statewide program that puts our members in housing non-profits to either work as housing counselors or as construction assistants, and we've had to look to our host sites to increase the match to us to be able to host the members. Our main goal here is to increase the capacity of these community-based organizations, and at least half of our organizations are faith-based. When we asked these organizations to increase their pay to us, it is going to eventually stop making sense for them to partner with our program, and that is really alarming to us for a couple of reasons.

First, we think that either they will just not be able to have a person there to work on all of these clients and to build these extra homes that they're being able to build, or that they'll have to create positions and pay salaries to people. While they would be paying extra for the salaries, it wouldn't be – let's see; we increased the match last year from \$3,500 to \$5,000 for them to pay for an AmeriCorp member. If we keep asking them to pay more, they're just going to either drop that person altogether or pay them a salary.

We think it's important for them to have AmeriCorp members at their sites because we really feel that we are adding a lot to these organizations in the way of leadership training for the individuals and citizenship training. We think that our AmeriCorp members become better citizens; I'm sure we all agree on that. We have also conducted studies that prove that this is true here in the state. So I just wanted to make sure that somebody brought up this little position. That's all I have to say.

G. VAN DER VEER Thank you, Stacy. We really appreciate your perspective.

S. MULLINS Okay.

D. EISNER Stacy, did you increase the match to be compliant, or did you increase it for another reason?

S. MULLINS We didn't mean to have to increase it so much in one leap because we had to, because our funding was cut from a 35-member corps to a 16-member corps. Just to have the money to run the program, we needed to increase that match. We had planned on doing it in a more incremental level. So I guess that's the point I really wanted to make is that we understand that the matches will have to increase, but we wanted to make sure that they didn't do so at a flood rate, that it just give us time to be able to do that slowly.

D. EISNER Thank you. That's very helpful.

G. VAN DER VEER Your perspective is helpful. Thank you, Stacy.

S. MULLINS Thanks.

G. VAN DER VEER Is there anybody else on the line there who would like to make a statement? Anyone?

COORDINATOR There are no further statements at this time.

D. EISNER Terrific.

G. VAN DER VEER Well, we'll go ahead and talk a little bit about what you can do if you find yourself, at a later date, thinking, "I wish I would have made a statement on that conference call." Guess what? Don't worry; there are other conference calls coming up. You can jump on one of these. Let me give you those dates real quickly.

April 1st, which is next Thursday from 3:00 to 5:00 p.m. eastern time, we'll be having another conference call; April 5th from 1:00 to 3:00, again, eastern time, will be another conference call. We have two more, actually three more meetings, counting tomorrow, which David is about to hop on a plane and fly out to in Boston. Next Wednesday, we'll be in Washington DC, and then on Friday, next Friday, we'll be in Dallas, Texas so if you feel like driving to Dallas or coming to Washington, you can participate in one of the public meetings that we're having on rulemaking.

Also, I want to call your attention to the fact that you can e-mail us, rulemaking@cns.gov. That's rulemaking, no spaces, all run together at cns.gov. Send us your comments, your thoughts, or you can fax them to Nicola Goren, who is the associate general counsel here at 202-565-2796.

So we, again, are very grateful for your participation in this call. For those of you who didn't speak today, we look forward to hearing something from you through one of the other venues I just mentioned and we look forward to continuing with you in this process. David?

D. EISNER For those of you that didn't speak, don't feel like unwanted lurkers. We really appreciate all of you being on the call to be following what we're doing. We're finding, on each call and in each meeting, that there are a lot of people that are very interested in this.

I testified yesterday for the House appropriations sub-committee for VA HUD, and the members on the committee were extremely interested in the points of view that are being expressed in these meetings. So thanks to everyone that participated, both speaking and listening. We're going to continue the process.

The only thing that I'd like to stress, and that we may not have said strongly enough in the introduction, is that the time to make yourself heard is now. We are going to hear, I believe, our last, have our last hearing or meeting on April 5th. From that point, we're going to start drafting proposed rules, and from that point forward, everything that we hear, we're going to continue to listen to, but it will be harder and harder for us to incorporate new ideas, comments, and so forth.

Once we promulgate our draft rules, all of the parameters of the discussion change because, from then forward, we will need to have a complete record of all comments, our ability to have iterative conversations to call up grantees and say, "What did you mean by this?" or, on a call like this, go back and forth on particulars will be far more limited, far more restricted, and our ability to incorporate new ideas, to incorporate specific cautions will be that much more difficult.

So I can't stress enough how much I appreciate folks participating, and I hope that people that are harboring an idea or a comment or a caution aren't waiting to see what the draft rule looks like before sharing that with us. With that said, thank you all very much.

G. VAN DER VEER Thank you.

R. MAUK Thanks, everybody.